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CLERK
U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

United States District Court
District of Minnesota

Tony Terrell Robinson,
Plaintiff,

VS.

Case No. 17-CV-437

Stephen Dannewitz, M.D., et al,
Defendants).

Tony Terrell Robinson's
Declaration in Opposition to Defendants
Motion for Summary Judgment

Tony Terrell Robinson, being of a sound mind
and of the majority, hereby declare as follows:

1. I am the plaintiff in the above-entitled
case. I make this declaration in opposition to all
of the defendants motion for summary judgment
on the claims of medical malpractice and their
deliberate indifference claims against Luck, Saini,
and Dannewitz.

SCANNED

MAY 21 2020

U.S. DISTRICT COURT MPLS

2. Attached as Exhibit #1 are true and correct copy of Dr. Jeffrey D. Seybold's Expert Witness Report/Affidavit, dated March 23, 2020. [Filed under seal] (cited to as RAE#1).

3. Attached as Exhibit #2 are true and correct copy of answers of interrogatories by Dr. Jeffrey D. Seybold, dated March 23, 2020. [Filed under seal] (cited to as RAE#2).

4. Attached as Exhibit #3 are true and correct copy of medical records for Tony Terrell Robinson. [Filed under Seal] (cited to as RAE#3).

5. Attached as Exhibit #4 are true and correct copy of Luck's answers to plaintiff's interrogatories [Filed under seal] (cited to as RAE#4).

6. Attached as Exhibit #5 are true and correct copy of Luck's answers to plaintiff's second set of Interrogatories [Filed under seal] (cited to as RAE#5).

7. Attached as Exhibit #6 are true and correct copy of Luck's answers to plaintiff's second set of Requests for Admissions. [Filed under seal] (cited to as RAE#6).

8. Attached as Exhibit #7 are true and correct copy of Luck's answers to plaintiff's third set of interrogatories. [Filed under seal] (cited to as RAE#7).

9. Attached as Exhibit #8 are true and correct copy of Luck's answer to plaintiff's third set of Requests for documents. [Filed under seal] (cited to as RAE#8).

10. Attached as Exhibit #9 are true and correct copy of Saini's answers to plaintiff's first set of interrogatories and request for production of documents. [Filed under seal] (cited as to RAE#9).

11. Attached as Exhibit #10 are true and correct copy of Saini's answers to plaintiff's second set of interrogatories and Requests for production of documents. [Filed under seal] (cited to as RAE#10).

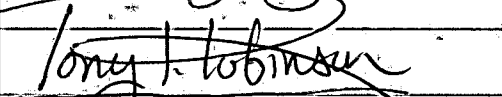
12. Attached as Exhibit #11 are true and correct copy of Saini's answers to plaintiff's Requests for admissions and third set of interrogatories and requests for production of documents. [Filed under seal] (Cited to as RAE #11).

13. Attached as Exhibit #12 are true and correct copy of Dannewitz's answer to plaintiff's interrogatories. [Filed under seal] (Cited to as RAE #12).

14. Attached as Exhibit #13 are true and correct copy of Dannewitz's Supplemental answers to plaintiff's interrogatories. [Filed under seal] (Cited to as RAE #13).

15. Attached as Exhibit #14 are true and correct copy of Minnesota Department of Corrections policies [Filed under seal] (Cited to as RAE #14).

Pursuant to 28 U.S.C. § 1746, I, Tony Terrell Robinson, declare under penalty of perjury that the foregoing is True and Correct.


Tony Terrell Robinson

5-14-2020